

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al.	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
	)	
Debtors.	)	
	)	Related Dkt. No. 12679, 12751, 12752, 12753, 12754, 12755, 12757, 12758, 12759, 12760, 12761, and 12762

Hearing Date: July 24, 2006 at 2:00 p.m. Agenda Matter No. 12

**DEBTORS' MOTION FOR LEAVE TO FILE A REPLY IN FURTHER SUPPORT OF  
THEIR MOTION FOR A SCHEDULING ORDER REGARDING CERTAIN OF THE  
DEBTORS' FIFTEENTH OMNIBUS OBJECTIONS TO PD CLAIMS (SUBSTANTIVE)**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby request authority pursuant to Del.Bankr.LR 9006-1(d) to file a reply in further support of the *Debtors' Motion for a Scheduling Order Regarding Certain of the Debtors' Fifteenth Omnibus Objections to PD Claims (Substantive)* (the "Motion") (Docket No. 12679), which is currently scheduled for hearing before the Court on July 24, 2006 at 2 PM ET.

Several objections have been filed in response to the Motion. *See* Docket Nos. 12751, 12752, 12753, 12754, 12757, 12757, 12758, 12759, 12760, 12761, and 12762. The objections mischaracterize the Debtors' request and make misstatements of fact and law with respect to history in these Chapter 11 Cases and relevant bankruptcy law governing estimation and abstention. Given the importance of the estimation process to the Debtors' reorganization efforts, the Debtors request an opportunity to file a Reply that (i) clarifies the record with respect

to the misstatements in the objections and (ii) responds to certain of the arguments asserted in the objections.

WHEREFORE, the Debtors respectfully request the entry of an Order granting it authority to file the Reply, a copy of which is attached hereto as Exhibit 1.

Dated: July 14, 2006

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- and -

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Co-Counsel for the Debtors and Debtors in Possession  
SO ORDERED this \_\_\_\_ day

of July, 2006

\_\_\_\_\_  
The Honorable Judith K. Fitzgerald  
United States Bankruptcy Judge